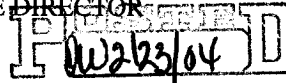
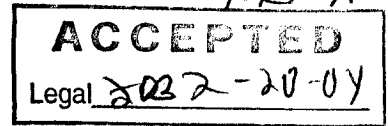


STATE OF SOUTH CAROLINA  
**State Budget and Control Board**  
OFFICE OF THE EXECUTIVE DIRECTOR



MARK SANFORD, CHAIRMAN  
GOVERNOR

GRADY L. PATTERSON, JR.  
STATE TREASURER

RICHARD ECKSTROM  
COMPTROLLER GENERAL

HUGH K. LEATHERMAN, SR.  
CHAIRMAN, SENATE FINANCE COMMITTEE

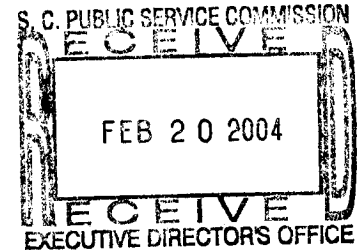
ROBERT W. HARRELL, JR.  
CHAIRMAN, WAYS AND MEANS COMMITTEE

FRANK W. FUSCO  
EXECUTIVE DIRECTOR

P.O. BOX 11608  
COLUMBIA, SOUTH CAROLINA 29211  
(803) 734-1261

EDWIN E. EVANS  
GENERAL COUNSEL

February 18, 2004



The Honorable Bruce Duke  
Executive Director  
South Carolina Public Service Commission  
101 Executive Center Drive  
Columbia, South Carolina 29210

Re: Application of Chem-Nuclear Systems, LLC (Fiscal Year 2003-2004)  
SCPSC Docket No. 2000-366-A  
Discovery Request of the South Carolina Budget and Control Board

Dear Mr. Duke:

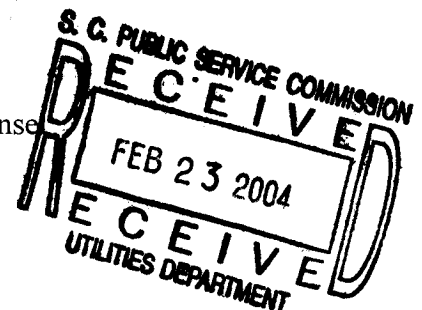
Enclosed please find four (4) copies of the Discovery Request of the South Carolina Budget and Control Board in the above matter. It would be greatly appreciated if you would file one copy and clock-in and return the three (3) additional copies in the self-addressed stamped envelope provided. Thank you for your assistance in this matter. Should there be any questions or comments, please do not hesitate to contact me.

Sincerely,

David K. Avant  
Office of General Counsel

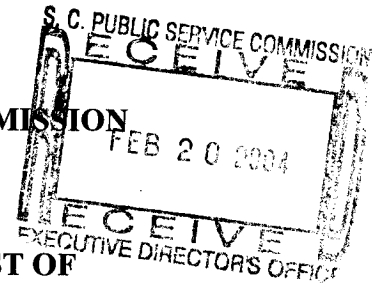
Enclosure

cc: Robert T. Bockman, Esquire



**STATE OF SOUTH CAROLINA**  
**BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION**

**DOCKET NO. 2000-366-A**



IN THE MATTER OF:	)	<b>DISCOVERY REQUEST OF</b>
	)	<b>THE SOUTH CAROLINA BUDGET</b>
Application of Chem-Nuclear Systems,	)	<b>AND CONTROL BOARD (SET NO.1)</b>
LLC, a Division of Duratek, Inc., for	)	<b>DATED FEBRUARY 18, 2004</b>
Identification of Allowable Costs	)	

**TO: THE APPLICANT AND ITS COUNSEL, ROBERT T. BOCKMAN, ESQUIRE**

Pursuant to the South Carolina Public Service Commission's ("the Commissions") Rules of Practice and Procedure and the South Carolina Rules of Civil Procedure, the South Carolina Budget and Control Board ("the Board") hereby served three (3) copies of these discovery requests upon the Applicant and files the original and one (1) copy of these discovery requests with the Honorable Bruce Duke, Executive Director of the Commission.

**INSTRUCTIONS**

- A. All information shall be provided to the undersigned in the format as requested.
- B. All responses to the below requests shall be labeled using the same numbers as used herein.
- C. If the requested information is found in other places or in other exhibits, reference should not be made to those, but, instead, the information should be reproduced and placed in the Interrogatory response in the appropriate sequence.
- D. The requested information should be bound in ring binders (loose leaf notebook) or otherwise bound.
- E. In addition to the signature and verification at the close of the Company's responses, the Company witness(es) or employee(s) responsible for the information contained in each answer should be indicated with each response.
- F. Each of the discovery requests should be reproduced at the beginning of each of the responses.
- G. If the response to any Interrogatory is that the information is not currently available, Applicant should state when the information will be available.

H. The Interrogatories shall be deemed continuing so as to require the Company to supplement or amend its responses as any additional information becomes available.

I. Responses are due not more than 10 days after the service of these requests.

### **INTERROGATORIES**

1. Describe the method used to calculate division of costs between Duratek and Chem-Nuclear for the skid used to transport the Maine Yankee Reactor Pressure Vessel (hereinafter the "Maine Yankee skid") as is referenced in item (e) of Exhibit C to Chem-Nuclear's Application for fiscal year 2003-2004.

2. Is there documentation which records the method used and the calculations performed related to the division of costs for the Maine Yankee skid between Duratek and Chem-Nuclear? Is there a written contract between Duratek and Chem-Nuclear in this regard?

3. In determining that the cost for the Maine Yankee skid should be equally divided between Duratek and Chem-Nuclear, was any evaluation done of the re-sale market for the skid?

4. Is there any documentation reflecting the negotiations between Chem-Nuclear and Duratek for the cost of the Maine Yankee skid?

5. Did Chem-Nuclear make any determination of the value of the Maine Yankee skid once the Maine Yankee Reactor Pressure Vessel (hereinafter "Maine Yankee RPV") had been transported to the Barnwell site?

6. At the time of the design of the Maine Yankee skid, did Chem-Nuclear make any determinations as to extra costs related to designing and/or engineering the skid which were associated with burial rather than transportation of the Maine Yankee RPV?

7. If the Answer to question 6 is yes, is there any documentation related to the determination of extra design and/or engineering costs for the Maine Yankee skid related to the burial of the Maine Yankee RPV?

8. At the time of the fabrication or construction of the Maine Yankee skid, did Chem-Nuclear make any determinations as to extra costs related to additional materials or labor costs related to the skid which were associated with burial rather than transportation of the Maine Yankee RPV?

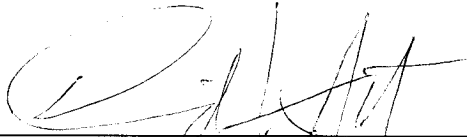
9. If the Answer to question 8 is yes, is there any documentation related to the determination of extra material and/or labor costs for the Maine Yankee skid related to the burial of the Maine Yankee RPV?

10. After its use for transporting the Maine Yankee RPV to the Barnwell site, does the Maine Yankee skid have re-sale value beyond its value as scrap metal? For example, can it be used to transport other heavy objects?
11. Does Chem-Nuclear have any documentation related to the determination of burial costs associated with the disposal of the Connecticut Yankee Reactor Pressure Vessel (hereinafter the Connecticut Yankee RPV) as referenced in item (c) of Exhibit D to Chem-Nuclear's Application for fiscal year 2003-2004?
12. Is any portion of the burial costs related to the Connecticut Yankee RPV associated with payment or compensation of any kind or form for a skid or other apparatus used to transport the RPV to the Barnwell site?
13. If the answer to question 12 is yes, please indicate the amount of the compensation or payment made with regard to the skid or other apparatus used to transport the Connecticut Yankee RPV to the Barnwell site.
14. If any portion of the burial costs related to the Connecticut Yankee RPV was associated with payment or compensation of any kind or form for a skid or other apparatus used to transport the RPV to the Barnwell site, please indicate the manner in which the amount of the compensation or payment was calculated.
15. Was the determination of the amount of the burial cost associated with the skid or other apparatus used to transport the Connecticut Yankee RPV based on the amount of burial cost assigned by Chem-Nuclear to the Maine Yankee skid?
16. After its use for transporting the reactor pressure vessel to Barnwell, does the Connecticut Yankee skid or transportation apparatus have re-sale value beyond its value as scrap metal? For example, can it be used to transport other heavy objects?
17. Did Chem-Nuclear play any role in designing or engineering the skid or other apparatus used to transport the Connecticut Yankee RPV to the Barnwell site?
18. If the answer to question 17 is yes, is there any documentation related to the role Chem-Nuclear played in the design and engineering of the skid or apparatus used to transport the Connecticut Yankee RPV?
19. If the answer to question 17 is yes, what was the extra cost associated with the design and engineering of the skid or apparatus used to transport the Connecticut Yankee RPV which would allow the skid or apparatus to also serve as a burial or disposal platform for the RPV? Is there any documentation supporting or related to this extra cost?

### **REQUEST TO PRODUCE**

1. Please produce any documents mentioned in any of the above interrogatories or referred to in any response to an interrogatory.

2. Please produce any document referred to in responding to any of the above interrogatories.
3. Please produce any documents that contain any information was created, used or considered in connection with any part of the transactions involving the Maine Yankee RPV and/or the Connecticut Yankee RPV. This request includes any preliminary documents and notes of discussions related to the transactions.

BY: 

Edwin E. Evans  
David K. Avant  
Robert E. Merritt  
OFFICE OF GENERAL COUNSEL  
State Budget and Control Board  
1201 Main Street, Suite 800  
Post Office Box 11608  
Columbia, South Carolina 29211  
(803) 734-1261  
Attorneys for the S.C. Budget and Control Board

February 16, 2004

STATE OF SOUTH CAROLINA

BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

DOCKET NO. 2000-366-A

IN THE MATTER OF:

Application of Chem-Nuclear Systems,  
LLC, a Division of Duratek, Inc., for  
Identification of Allowable Costs

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**CERTIFICATE OF SERVICE**

I, Renee' Larsen, an employee of the South Carolina Budget and Control Board, Office of General Counsel, do hereby certify that I have this day served copies of the **DISCOVERY REQUEST OF THE SOUTH CAROLINA BUDGET AND CONTROL BOARD** on the Plaintiff by causing same to be deposited in the United States mail, postage pre-paid, and addressed as follows:

Robert T. Bockman, Esquire (Via US Mail)  
McNair Law Firm  
Post Office Box 11390  
Columbia, SC 29211  
Counsel for Chem-Nuclear Systems, LLC

S.C. Consumer Advocate (Via US Mail)  
Nancy Vaughn Coombs  
S.C. Dept. of Consumer Affairs  
Post office Box 5757  
Columbia, SC 29250

The Hon. Henry D. McMaster (Via US Mail)  
Attorney General  
State of South Carolina  
Post Office Box 11549  
Columbia, SC 29211

Catherine D. Taylor, Esquire  
Scana Services, Inc.  
Legal Department 130  
Columbia, SC 29218

The Hon. C. Earl Hunter, Commission (Via US Mail)  
S.C. Dept. of Health and Environmental Control  
2600 Bull Street  
Columbia, SC 29201

  
\_\_\_\_\_  
Renee' Larsen

Columbia, South Carolina  
February 18<sup>th</sup>, 2004.